Exhibit 2

TONAWANDA COKE CORPORATION
BOX 5007 / TONAWANDA, N.Y. 14151-5007 / (716) 876-6222

September 7, 2009

Received 10/5/09

Mr. Kenneth Eng, Chief Air Comp. Branch
USEPA-Region 2
290 Broadway, 21st Floor
New York, NY 10007-1866

Re: CAA-02-2009-1475

Dear Mr. Eng:

The following are our responses to your Sec. 114 Letter Reference Number CAA-02-2009-1475 that was received by me on September 8, 2009.

Should you have any question, please contact me at 716 876-6222 or the address above.

Very Truly Yours
Tonawanda Coke Corporation

Mark L. Kamholz
Manager-Environmental Control

Attachment to Enclosure 1

CERTIFICATION OF RESPONSE

State of New York :

County of Erie :

I certify, under penalty of law, that I have personally examined and am familiar with the information submitted in response to the Information Request and all documents submitted with this response, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted with this response are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that for one year from the date of the Information Request, I am under an obligation to supplement my response to the Information Request if any additional information relevant to the matters should become known or available to me.

Mark L. Kamholz
NAME (print or type)

Manager- Environmental Control
TITLE (print or type)

Mark L Kamholz
SIGNATURE

Sworn to before me this 6 day of October, 2009

Linda L Baker
Notary Public

LINDA L BAKER
NOTARY PUBLIC, STATE OF NEW YORK
Registration No. 01BA6142946
Qualified in Niagara County
Commission Expires March 27, 2010

1. See Attachment 1. Consulted J. Matteson

2. See Attachment 2.a. and 2.b. Consulted J. Matteson

3. By-pass Bleeder Flare

a. The by-pass bleeder flare is operated by manually opening the valve that connects collector main to the flare. The flare is equipped with a natural gas pilot light that provides automatic ignition of any flared raw coke oven gas. The pilot light has a thermal couple that sets off a strobe light should temperature fall below 600 F at the thermolcouple. The NYSDEC inspects our facility for Title V flare compliance.

b. The frequency of venting to the by-pass stack is historically very infrequent. Our records do not indicate any incidents except for several in 2009. March 17, June 23 and Aug. 21.

c. Emissions from the flare have not been reported to EPA and /or NYSDEC as deviations from our Title V Permit. Any flare event is not believed to be a deviation because the COG is combusted and no by-pass/bleeder stack exists to circumvent the by-pass/bleeder flare.

4. March 17, 2009 Venting

a. See Attachment 4.a

b. The March 17, 2009 venting was the result of two malfunctions. The first was a bearing failure on our Co-Gen unit that is the main electric power source for the plant. When the Co-Gen unit went down, the back-up diesel generator was immediately put into service to power the plant. After a short time the diesel generator shut down due to cooling system leak. This occurred at approximately 9:40 AM. With no power, the coke battery was put into neutral using a manual control of compressed nitrogen to move the reversing system to neutral. The flare was opened at 9:50 AM. A power outage does not immediately stop steam production to drive the exhauster but continues to operate for 5-10 minutes. The coolant leak was repaired and power restored at about 10:40 AM. Pumps and the electric exhauster were then restarted. The battery operating conditions returned to normal and the flare closed at 11:05 AM. Full boiler operation was returned at 12:30 PM.

To mitigate the event we also opened several standpipe caps, ignited the gas, to reduce collector main pressure and thereby reduce battery stack emission.

We do not have chemical composition analysis of our raw coke oven gas.

c. Calculations of emissions from the combustion of the flared raw coke oven gas were not made.

5. One recent, July 5, 2009, informal test was done on the battery waste stack. See Attachment 5. No other stacks have been done in the last 10 years.

6. See Attachment 6 Consulted M. Durkin

7. Coke Ovens and Doors Consulted T. Brossack and P. Pierce

a. Oven to flue leakage is minimized by using wet and dry gun shooting procedures on the ends of the oven walls. In addition, patching procedures are implemented on oven wall ends. Dusting is performed on entire ovens. This involves placing the empty oven heating walls on suction injecting a dust that adheres to and seals any crack or defect in the heating wall.

Thru-wall replacement is the entire removal of a heating wall from end to end and floor through the roof and rebuilding the wall with the modular block system.

End flue repair is the removal of a limited number of flues, usually not more than 5, and rebuilding those flues with modular block system.

Modular block system is a non-expanding/contracting cast into a custom block that also greatly the number of joints from that traditional silica brick.

Frame, standpipe, gooseneck, downcomer, door, chargehole casting repair/replacement are done as needed.

b. See Attachment 7.b.1 for door and frame rehabilitation by outside contractor.

Door sealing edges and gaskets are routinely replaced or repaired as needed. This a part of normal operations and records are not keep. A dusting monthy log is maintained for the current month only. See Attachment 7.b.2

Tonawanda Coke has performed four (4) end flue repairs using the modular system. Three (3) on the coke side and one (1) on the pusher side. In addition three (3) thru walls have done primarily as a demonstration of the modular block technology.

Generally records are not kept of oven maintenance.

c. A technical analysis of each oven-to-flue leakage does not exist.

d. All ovens are sealed to the point where stack emissions are controlled. There are no "bad" ovens.

8. Quench Towers

a. Quench towers are not baffled. The quench towers at Tonawanda Coke are not the traditional quench towers. They are short, about 40 feet high, and have very large openings, about 14 feet by 51 feet. This greatly reduces the upward velocity of the quench. In addition, foundry coke offers at least 3.38 times less surface area for any particulate generation.

b. Maintenance is done on an as needed basis. Records are not maintained.

9. Dissolved solids testing is done on the make-up water to the quench tower. River water is the make-up water. See Attachment 9.

10. See Attachment 10

11. NESHAP Subpart L Initial Source Report and Request or Waiver
See Attachment 11

12 Subpart L source emissions from the tar decanter, tar storage tank(s), BH liquor circulation tank, light oil storage tank are controlled by negative pressure to suction side of the exhauster. The light oil still vent is closed and the wash oil decanted, secondary wash oil decanter, and wash oil circulation tank are equalized. The exhauster is sealed with gaskets at the flanges and bearings have carbon seals with continuous oil lubrication.

13.
a. See Sec. 12 TAR INTERCEPT. SUMPS?

b.

Source	Date Controlled	
Tar Decanter	1990	
BH Circulation Tank	1990	
Tar Storage Tank	Removed from service 1990.	Replaced around 2000 with suction control.
Light Oil System	1991	
Light Oil Stg Tank	2009	Foundry plant exclusion
Weak Ammonia Tank	Not controlled	Foundry plant exclusion

c. Operating parameters that are monitored are the suction and presence or absence of leaks. Tonawanda Coke ensures compliance by 24/7 manned operation and monthly leak checks.

14.
a. Schematics, design specifications, piping and instrument diagrams do not exist.

b. Operational specification for the pressure drop monitor is 1 mm negative pressure.

c. Each component is inspected by the operator during his shift. No formal maintenance inspection record exists.

15. "In Benzene Service" items include the gravity pipeline that carries light oil from the condenser to the light oil storage tank and the light oil pump that takes light oil from the storage tank to customer transport.

When equipment is in service, they are monitored monthly.

The equipment is marked with "In Benzene Service" signs. See Attachment 15.

16. In Benzene Service Equipment

a. Schematics, design specifications, piping diagrams, instrumentation diagrams do not exist.

b. A leak has never been found in the light oil pipeline. Routine repacking of the light oil pump has prevented a leak from being documented.

c. During the April 14-21, 2009 EPA inspection, it was documented that the exhauster bearing and spool piece (flange) were leaking on April 17, 2009. On April 22, 2009 this equipment was retested and found to have no leaks. EPA's Mr. Ken Garing took two air canister samples from the immediate vicinity of the exhauster on April 20, 2009. What were those results?

The Tar Precipitator and Light Oil Storage Tank are not covered by Subpart L. None the less, the Light Oil Storage Tank is now controlled by connection to the suction side of the exhauster and the Tar Precipitator Sump is scheduled to be covered as requested by Ken Garing.

d. Consulted P. Cahil

The light oil system, including the "In Benzene Service" light oil pump, has been shut down since Nov. 2008. Prior to that, the light oil pump was manually operated about once per week, and observed by the area operator to load customer transport. No records exist of the visible monitoring.

e. See Attachment 16.e

17. See Attachment 16.e

18. See Attachment 18

19. COG exhaust and venting system

a. Process and instrumentation diagram of entire COG exhaust and venting system does not exist.

b. See Attachment 19.b

20. COG Pressure Relief Valve Consulted P. Cahill

a. The purpose of the PRV is relieve excessive pressure in the gas system. Should that pressure exceed a preset level, the valve opens automatically.

b. About 10 yrs. ago.

c. There are no written operating instructions for the PRV. The objective is to maintain consistent operating gas pressure and not exceeding the set point thus conserving COG for boiler and coke battery use.

d. The only operating parameter that is monitored for the PRV is the COG pressure. Charts are maintained for 30-days plus to date. Charts that exist are in Attachment 20.d.

e. The PRV opens very rarely. Again the objective is to conserve COG for boiler and battery use. Should the valve open it would only be for 5-10 seconds. In the open position, the PRV could emit COG at the rate of 7135 lbs./hour(consulted C. Lauricella). The PRV has not opened in months.

f. COG emissions have not been estimated nor have the been reported as deviations from TCC's Title V permit. The emissions have not been reported because they are believed to be deminimus.

Note to Response 20

The current PRV is to be replaced with a new PRV located at the end of the COG gas system. The new PRV is equipped with a shielded automatic flare of similar design to the one on the collector main. However the new PRV is equipped with an electronic igniter.

21. The exhausters, TCC has three (3), are multistage centrifugal Hoffman blowers of identical design. The exhausters operate at constant speed with #3 being driven by a steam turbine and #1 and #2 driven by electric motor. Control of the suction side is provided by an automatic butterfly valve that directs more or less COG through a gas pipeline connecting the discharge side of the exhauster to the suction side.

TCC operates one (1) exhauster at any time.

Currently #2 exhauster has been sent for reconditioning with a replacement exhauster put in #2 exhausters physical location.

See Attachment #21 for in service and maintenance record.

22. Catalytic Converter

a. Records do not exist that show what parameters were monitored for with the catalytic converter control system. I do not have any personal recollection of this either.

b. The catalytic control system was abandon sometime in the early 1990's. As such there is no monitoring records of the catalytic control system. The alternate control system was put in place shortly before Sept. 14, 1992

c. See Attachment 22.c.

d. See Attachment 16.e.

23. We do not have identification tags for 61.246(b)(1). Leaks occur very rarely and when found are generally repaired immediately.

24. Opacity Readings See Attachment 24

25. Item 35.2 of Title V
a. See Attachment 25.a.

b. Method 22 observer is primarily Mr. Dennis Mock A few observation have been documented by Mr. Pat Cahill also. Neither has Method 22 Certification.

c. No Method 9 observations have been conducted on the boiler stack.

26. An original RACT Stack Test was conducted on Boiler #7 in the mid 1990's. I have not been able to find this data. RACT was again reviewed beginning in 2002. See Attachment 26.

27. Boiler #3 has not had a tune-up in the last five years because it has not operated in the last five years.

Boiler #2 tune-ups are in Attachment 27. My files do not have a report for 2005. Tune-up for this year is scheduled for Oct. 6, 2009.

28. I have been unable to locate the Initial Compliance Certification for 40 CFR 63.311(b). It would have been mailed to EPA in early 1996 as Tonawanda Coke chose the MACT Track. See Attachment 28.

29 Method 303
a. Guardian Environmental Associates, Inc. is the entity contracted to perform the daily Method 303 inspections. The names of the people performing the inspections in the last five years are:
Mark Kibler
Carl Horne
Brian Hawk

b Method 303 and Method 9 Certifications are in Attachment 29.b

c. See Attachment 29.c for 2008 data as agreed to by EPA and relayed to me in a Sept. 17, 2009 phone conversation with your Mr. Harish V. Patel.

d. See Attachment 29.d. 30-day rolling average is calculated by use of EPA supplied software.

e. See Attachment 29.e. 30-day rolling average is calculated by use of EPA supplied software. The daily log ave. of charging is calculated by use of the formula e -1. For the example in Attachment 29.e the calculation for daily log ave. is:

VE(seconds)	
3.0 + 1 = 4.0	LN 4 = 1.3863
7.0 + 1 = 8.0	LN 8 = 2.0794
2.0 + 1 = 3.0	LN 3 = 1.0986
5.5 + 1 = 6.5	LN 6.5=1.8718
5.0 + 1 = 6.0	LN 6 = 1.7918
	8.2279 total
	div. by 5 = 1.6458
	e1.6458 = 5.1840
	-1 = 4.18

f. See Attachment 29.f

30. Collector Main and off-take system

a. Off-take leak reporting is a normal part of Method 303 determinations and calculations for determining compliance. Leak thresholds have not been exceeded.

The documents supplied under Attachment 29.c provide examples of main leak reporting. The exact time of sealing has not been recorded but the subsequent inspection that shows 'no leak observed" does document the repair. See Attachment 30.a.1. We have instituted a formal document to be filed out when a repair is made. See Attachment 30.a..2.

b. The following would have made leak repairs in the last five years:

General Forman

John Bowen, Marc Slomba, Frank Gonzalez, Dan Cullan, Justin Smith, Steve McCormack, Joe Tucker, Dave Dahl, Pete Dolan, Fritz Dusel, Dennis Brown

Heating Forman

Tony Brossack, Jerry Priamo, Dan Heukrath

31. Method 22 observations have not been documented. Observations have not been made because they would require a plant shut down to perform them.

32. Pilot Light

a. The by-pass bleeder flare was installed by March 31, 1994. See Attachment 32.a. The pilot light was part of that installation. While I could not find any difinitive document as to date of installation, however, a copy of the pilot light construction approval is also in Attachment 32.a.

b. The pilot light has a thermocouple in the flame that sends a signal to a switch that operates a strobe on top of the collector main. Should the thermocouple signal drop below 600 deg. F. output, the switch closes to activated the strobe light indicating the pilot light is out.

c. Documentation indicating when the thermocouple was in or out of service during the last five years does not exist. However, we do know that on Aug. 21, 2008 the pilot was found to be not operating. It was relit but the thermocouple was faulty. A new thermolcouple was installed on Sept. 9, 2008. Subsequently the natural gas regulator was not responding to adjustment and was replaced on Nov. 17, 2008. This did not cause any pilot light outage. On Jan. 19, 2009 the charge car hit an electrical conduit that supplied power the pilot light indicator system and caused some relays to burn. New relays were ordered and installed by Feb. 12, 2009 returning the strobe light indicator to service. The pilot light was checked visually during this time and was in continuous service.

d. See 32c.

33. Documentation as to when the pilot light on the by-pass bleeder flare was not operating does not exist.

34. No V.E. determinations greater than 0 have been made. No Method 9 evaluations have been made as a result.

35. See Attachment 35

36 See Attachment 36

37. See Attachment 37 This is the only analytical report I could find. It supports the Oct. 1, 1990 letter.

38. Consulted P. Cahill

a. The 10 COG drip legs condensate is estimated to be 110 gals. per day or 40,150 gals/yr.

b. The secondary cooler sump volume is unknown. This system is a part of the BH cooling liquor system and as such its output is also part of the circulation system.

c. The liquid in the tar precipitator sump(s) is mostly tar. The estimated volume of 58,400 gals/yr. is pumped directly to the tar decanter and recovered as product.

d. The ammonia removal sump operates in a typical range of 8-18 gals/min or 4204800 to 9460800 gals/yr.

Note: Double counting of these sources is of major concern to us.